1 2 3 4 5	CHRIS T. RASMUSSEN, ESQ. Nevada Bar 7149 RASMUSSEN & KANG 330 South 3 rd Street, Suite 1010 Las Vegas, Nevada 89101 (702) 464-6007 Attorney for Peter Santilli		
6	UNITED STATES DISTRICT COURT		
7	DISTRICT OF NEVADA		
8 9 10 11 12	UNITED STATES OF AMERICA, Plaintiff, v.)) 2:16-cr-00046-GMN-PAL) REPLY TO GOVERNMENT) RESPONSE TO MOTION FOR	
13 14 15	PETER SANTILLI, Defendant.) BILL OF PARTICULARS)) _)	
16 17 18 19	Defendant, PETER SANTILLI, by and through his attorney of record, Chris T. Rasmussen, Esq., submits the following Reply to Government's Motion For Bill of Particulars.		
20	DATED this 30th day of May, 20	116.	
21		Respectfully submitted,	
22		/s/ CHRIS T. RASMUSSEN, ESQ.	
2324		Nevada Bar 7149	
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MEMORANDUM OF POINTS AND AUTHORITIES

The Government responds that they have sufficiently presented enough information in the Superseding Indictment to allow Santilli to present a defense. This is incorrect. The incident that took place in Bunkerville, Nevada, involved hundreds of people some of which were government employees, and others who were there in support of a protest against BLM regulations regarding land use.

Each person had different reasons for being in Bunkerville. The intent of each of the 19 defendants regarding the charges presented is sufficiently different. It is unclear which person in the government felt threatened or intimidated by the protesters.

Honorable Anna Brown heard a similar motion for a bill of particulars in the District of Oregon, in which the charges are somewhat similar in that protestors and government employees disagreed as to the rightful possession, and control over land currently managed by the BLM. Judge Brown denied the motion for a bill of particulars, however, she did issue an order:

On the other hand, it would be very helpful for case-management purposes in the 14weeks remaining before jury selection begins and, in particular, with respect with the upcoming deadlines for the parties to submit jointly proposed "elements" jury instructions and for defendants to file their "Round Two" Defendant specific Motions for the government to provide to each Defendant the following:

- A Statement of the primary factual bases supporting the Defendant's alleged criminal liability for each Count in which that Defendant is charged; and
- 2. A statement as to whether such criminal liability is as a principal, an aiderand abettor, or both.

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(See Judge Brown Order, attached as Exhibit A).

This will allow for Santilli to properly defend against these charges. The indictment currently contains gun charges which carry decades in prison for persons who had no weapon in their possession. A conspiracy count to include anyone in the area of Bunkerville, that is not a government employee, on the date of the alleged "Stand Off" is alleged.

At Santilli's review of the Detention Order, the government played in court an audio from the Pete Santilli Show that took place six months after the alleged "Stand Off". It is impossible to understand exactly what conduct the government is presenting as unlawful in their Superseding Indictment. Therefore, we request a similar statement as the one Judge Brown ordered in the Oregon "Stand Off" case.

This demonstrates the frustration and difficulty defending against speech that is alleged to occur during the protest and apparently six months after.

Conclusion

Santilli requests that this Court either issue an order for a Bill of Particulars or a similar Order as in the Oregon case in which Judge Brown issued the attached Order.

DATED this 30th of May, 2016.

/s/ Chris T. Rasmussen

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